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8 ACTING UNITED STATES TRUSTEE

9
10 UNITED STATES BANKRUPTCY COURT
11 SOUTHERN DISTRICT OF CALIFORNIA

12 In re:

13 BORREGO COMMUNITY HEALTH
14 FOUNDATION,

15 Debtor.

16 Case No.: 22-02384-LT11

17
18 **SECOND STIPULATION TO
EXTEND TIME FOR ACTING
UNITED STATES TRUSTEE TO
FILE STATEMENTS OF
POSITION FOR CERTAIN
APPLICATIONS TO EMPLOY
PROFESSIONALS FILED BY
DEBTOR**

RECITALS

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20 1. On October 12, 2022, Borrego Community Health Foundation (“Debtor”)
21 filed applications to employ professionals to assist the Debtor with its duties in the
22 above-captioned chapter 11 case, as follows: a) Dentons US LLP as general
23 bankruptcy counsel (docket # 86), b) Hooper, Lundy & Bookman P.C. as Debtor’s
24 healthcare regulatory counsel (docket # 89), and c) Ankura Consulting Group, LLC, to
25 provide a Chief Restructuring Officer and certain other personnel (docket # 87)
26 (collectively the “Applications”).

2. The Acting United States Trustee (“UST”) and proposed counsel for the Debtor (collectively the “Parties”) have met and conferred regarding questions raised by the UST with respect to the Applications. That process is ongoing and the Parties desire additional time to work through those questions.

3. The last day by which the UST must file her Statements of Position relative to each of the Applications is currently November 1, 2022. The Parties request the Court extend that deadline to November 10, 2022.

STIPULATION

Wherefore, the UST and Debtor hereby stipulate and agree that the deadline by which the UST shall file her Statements of Position as they relate to the Applications, shall be extended up to and including November 10, 2022.

TIFFANY L. CARROLL
ACTING UNITED STATES TRUSTEE

Dated: November 1, 2022

By: /s/ David A. Ortiz

David A. Ortiz

Attorney for the

Acting United States Trustee

DENTONS US LLP
SAMUEL R. MAIZEL
TANIA M. MOYRON

Dated: November 1, 2022

By: /s/ Samuel R. Maizel

Samuel R. Maizel

Proposed Attorneys for

Borrego Community Health Foundation